

EXHIBIT E

DENYONNA N. REED - October 21, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DENYONNA N. REED,)
) CIVIL ACTION
PLAINTIFF,)
)
VS.) COMPLAINT 5:22-CV-00068
)
I.Q. DATA INTERNATIONAL,)
INC.,)
)
DEFENDANT.)
)
)

ORAL VIDEOCONFERENCE DEPOSITION OF

DENYONNA N. REED

OCTOBER 21, 2022

Volume 1

ORAL VIDEOCONFERENCE DEPOSITION OF DENYONNA N.
REED, produced as a witness at the instance of the
DEFENDANT, and duly sworn, was taken in the above-styled
and numbered cause on the 21st day of October, 2022,
from 10:02 a.m. to 11:08 a.m., via Zoom, before Michelle
Hill, CSR in and for the State of Texas, reported by
machine shorthand, pursuant to the Federal Rules of
Civil Procedure.

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A P P E A R A N C E S

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1 THE REPORTER: My name is Michelle Hill,
2 Texas CSR 5663. I am reporting this deposition remotely
3 by stenographic means from Lubbock, Texas. The witness
4 is located in San Antonio, Texas.

5 DENYONNA N. REED,
6 having been first duly sworn, testified as follows:

7 EXAMINATION

8 BY MR. HAMEL:

9 Q. Good morning, Ms. Reed. How are you doing
10 today?

11 A. Good morning. I'm fine.

12 Q. Ms. Reed, today we are here taking your
13 deposition in a lawsuit that you filed in the Western
14 District of Texas against I.Q. Data International, Inc.
15 Does that sound right?

16 A. Yes, sir.

17 Q. Okay. Have you ever filed a lawsuit before?

18 A. No, sir.

19 Q. Okay. Have you ever given a deposition
20 before?

21 A. No, sir.

22 Q. Okay. Nothing to be worried about. Just very
23 briefly, the way that this works, I ask questions; you
24 answer them. It's not a test.

25 You're not stuck here. If you need to

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1 take a break at any time, please just let me know.

2 Happy to take a break.

3 The only thing I will ask is, if I have a
4 question posed to you, that you go ahead and respond to
5 the question before we take any break.

6 A. Yes, sir.

7 Q. This wonderful lady right here up in the
8 corner of your screen is our court reporter. I suspect
9 that more than once during this deposition, she will
10 admonish me for speaking too quickly.

11 One of the things that makes her job very
12 difficult is if you and I talk over each other. So what
13 I will ask is, if you would please let me finish my
14 complete question before you start your answer, and I
15 will do my utmost to let you complete your full answer
16 before I ask my next question. Fair enough?

17 A. Yes.

18 Q. Okay. We are not in a courtroom today. We're
19 not in front of a judge or a jury; however, this is
20 sworn testimony under oath. So the penalties of perjury
21 do apply, and you are obligated to tell the truth.

22 A. Yes, sir.

23 Q. Okay. Certainly not trying to infer anything.
24 It's just one of the these weird questions we need to
25 ask. You aren't on any substances today that would

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1 prevent you from being able to give full and truthful
2 testimony, are you?

3 A. No, sir.

4 Q. Okay. I haven't ever gotten yes to that
5 question yet, but still got to ask it. I'm sure some
6 day I might, but not today. So good to hear that.

7 Last thing, if I ever ask you a question,
8 and you're confused about it, or I said it weirdly, or
9 just don't -- you know, didn't hear me, the internet
10 cuts out, whatever, please just go ahead and let me know
11 and ask me to rephrase the question. I probably asked a
12 bad question, and I'm happy to go ahead and rephrase it
13 in a way that you can understand it. Sound good?

14 A. Yes.

15 Q. Great. So if you would for me briefly, could
16 you just tell me why it is that you felt the need to
17 bring this lawsuit that's the reason we're here today?

18 A. So initially back in November of 2021, prior
19 to that, I started rebuilding my credit and really
20 focusing on cleaning up my credit and started the
21 building process.

22 I get a -- so at this point, I'm checking
23 my credit constantly every day, just because I'm on the
24 process of building and looking to buy a home.

25 So this particular day, I get the

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1 notification, and I'm like, hey, where did this come
2 from? I never lived at this apartment complex. I'm not
3 sure why my name and another person's name is on here
4 saying that I owe them this amount of money.

5 So when I looked at the case, I called the
6 apartment complex, which is Icon Apartments. I called
7 them, and I tried to figure out what was going on
8 with -- why I am being charged an amount of money, and
9 they kind of just gave me the runaround.

10 They didn't want to give me -- they didn't
11 want to answer any questions. They didn't want to let
12 me know why I was -- why this was showing up on my
13 credit report. I tried to speak to the property
14 manager. I also called the owners of the property, and
15 no one would give me any answers.

16 So at this point, I became extremely
17 frustrated. I reached out to the debt collector. They
18 wouldn't give me any answers. They -- which is I.Q.
19 Data. I reached out to them get answers concerning this
20 alleged debt that was on my credit report, and they
21 wouldn't give me any answers. They just kind of gave me
22 the runaround.

23 And at this point, I became very
24 frustrated. My current lease at my apartment complex
25 was up. I was looking to move, and because I owed this

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1 apartment complex alleged debt that's now on my credit,
2 it's very hard for me to move into another complex
3 because everybody is looking at this as, oh, you owe
4 this person money, so we're going to deny your
5 application.

6 So that became frustrating going through
7 that process and not just getting any direct answers or
8 able to get it off of my credit report was the main
9 reason that I went ahead and decided to take legal
10 matters.

11 Q. Okay. A couple things I'd like to break down
12 about that if we could. So you said this started
13 November of 2021; is that correct?

14 A. Yes, sir.

15 Q. Okay. And the alleged debt was owed to Icon
16 Apartments. Did I hear that right?

17 A. Yes, sir.

18 Q. Okay. Are you familiar with Icon Apartments,
19 or was it just, you know, who are these people? What's
20 going on?

21 A. Well, I -- initially I -- in 2020 -- I'm not
22 sure the exact date or month -- I went to the complex.
23 I viewed the property. I filled out an application with
24 them to -- I was going to stay at the property; however,
25 I was still hunting for different -- in different areas.

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1 I filled out the application. I paid the application
2 fee, and I was still hunting for other apartments.

3 So I found another apartment. I called
4 Icon Apartments and told them, hey, I'm not going to
5 move here. I found another property. And they agreed
6 with that. They said, you won't get your application
7 fee back, which I was fine with. I told them, okay, I
8 don't -- you know, that's fine I can't get my
9 application fee back, but I'm no longer going to move
10 over here. I found another property. That was the only
11 contact I had with this apartment.

12 After that I didn't -- it was no more
13 contact with them until I seen the -- until I seen it
14 pop up on my credit report.

15 Q. Gotcha. So you said you couldn't remember
16 exactly when it was that you would have visited the Icon
17 Apartments, but did you say sometime in 2020 or earlier
18 in 2021?

19 A. No, it was in 2020. It was -- I would say
20 around in April of 2020.

21 Q. Okay. And filled out the application, paid
22 the application fee. Did you sign a lease and then
23 cancel it, or you just never signed a lease?

24 A. I never signed a lease. I only filled out the
25 application, and that was it. I never signed a lease.

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1 Q. Gotcha. And do you happen to remember around
2 what date it was when you were speaking with those folks
3 at the Icon Apartments saying, hey, you know, I know I
4 submitted this application, but I'm not going to be
5 signing a lease?

6 A. It had to be towards -- it had to be mid
7 April, around April 14th of 2020.

8 Q. Okay. Do you happen to recall the name of the
9 person you spoke to?

10 A. No, sir.

11 Q. Gotcha. Do you have any email correspondence
12 with them, anything like that?

13 A. No, sir.

14 Q. Okay. That's totally fine. Were you able to
15 get another -- so I assume -- you didn't move in to the
16 Icon Apartments. Did you move into a new apartment
17 shortly thereafter?

18 A. Yes, sir.

19 Q. Okay. What's the name of that apartment?

20 A. At the time it was The Life at Castle Hills.

21 Q. One more time.

22 A. The Life at Castle Hills.

23 Q. Gotcha. And I gather from you saying, at that
24 time, are you no longer in that apartment?

25 A. I'm currently still here.

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1 Q. Okay. Great. About how long after you
2 contacted Icon and told them, you know, application, but
3 I'm not going to sign there, did you move into the new
4 apartment?

5 A. It was that same month, within a couple days
6 of that.

7 Q. Gotcha. And you're still currently there,
8 right?

9 A. Yes, sir.

10 Q. Awesome. One thing you mentioned earlier, you
11 said, you were very focused on rebuilding your credit,
12 and that's why you were paying a lot of attention to
13 your credit reports. What exactly were you rebuilding
14 your credit from?

15 A. Just cleaning up old debt that was on there
16 like medical bills and things of that. Just trying to
17 pay some things off in order to, as I mentioned, looking
18 to buy a home, so that was the direction I was heading
19 towards.

20 Q. Gotcha. So some medical debt. Any other kind
21 of debt? Student loans, credit card debt, anything like
22 that?

23 A. No credit card debts. Student loans, I paid
24 off all my student loans, and I was just paying off some
25 medical bills that was still on there.

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1 Q. Were you able to take advantage of that
2 program with the student loans, or were you one of
3 those, you know, unfortunate ones where you were
4 responsible enough to pay off your student loans? You
5 kind of got hung out to dry a little?

6 A. Yeah. I actually paid them off myself before
7 that happened.

8 Q. Well, you know, good for you. So you know,
9 unfortunate, but good enough. Have you ever been
10 contacted by a debt collector before?

11 A. Yes.

12 Q. How many times? You can ballpark it for me.
13 It doesn't need to be a specific number.

14 A. Five or six.

15 Q. Okay. And was it related to different debts,
16 or was it just that medical debt that we were talking
17 about?

18 A. Just medical.

19 Q. Gotcha. And has that medical-debt issue
20 gotten resolved, or is that still outstanding?

21 A. No, it's been resolved.

22 Q. Okay. When exactly was that paid off?

23 A. January, around January of this year, 2022.

24 Q. Okay. So when you are monitoring -- excuse
25 me. When you're monitoring your credit, is that just

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1 something you do online? Is there an app for that? How
2 exactly are you monitoring your credit, or do you have
3 an alert set up?

4 A. I have an alert set up with Experian, with
5 Credit Karma, and then Credit Sesame as well.

6 Q. Gotcha. So if something gets reported on your
7 credit, explain that to me. What happens? Does it just
8 ping on your phone, and then you click on it?

9 A. Yes. It gets a notification, and then I also
10 get text messages, and I also get notified by email.

11 Q. Okay. So get a ping on your phone, click on
12 it, and what exactly does it say? Does it say, you
13 know, Icon Apartments are reporting this amount?

14 A. Yes, at the time that's what happened. It
15 showed me that I had a new -- a new debt on my credit.
16 So I clicked on it, and it said \$984, and I scrolled
17 down, and it said Icon Apartments with the address on
18 it.

19 Q. Gotcha. And obviously, you know, I never
20 lived at the Icon Apartments. What is this, right?

21 A. Right.

22 Q. So after that what was -- did you contact I.Q.
23 Data first, or did you contact the Icon Apartments first
24 once you saw that credit ping?

25 A. Initially I contacted the Icon Apartments

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1 first.

2 Q. Okay. And do you happen to recall the name of
3 the person you spoke to there?

4 A. No, sir.

5 Q. Okay. What, if anything, did you talk to the
6 folks at the Icon Apartments about?

7 A. I just talked to the lady that works in the
8 office. I asked her, hey, I'm seeing this debt on my
9 credit report. Could you explain this to me? What is
10 this about?

11 And she's like, well, we don't have any
12 information from you. So I then did ask to speak to
13 either a manager or the property manager that was on,
14 and she's like, well, he's busy. So he'll have to give
15 you a call back.

16 I waited about two hours. No one
17 contacted me back. I reached back out to them. They
18 still gave me the runaround. Oh, he's still busy. Can
19 we take a message? I left my name, number, waited till
20 the end of the business day, still didn't get any
21 information. No one contacted me back.

22 I called the next morning as soon as they
23 opened. Same thing. Oh, he's not in right now. It was
24 a constant runaround before I actually spoke to the
25 property manager. And then once I did speak to the

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1 property manager, which probably was about a week span
2 of trying to get in contact with him. The ladies in the
3 office were doing what they can to look up the
4 information, but they just wouldn't -- they couldn't
5 give me anything.

6 So once I finally talked to the property
7 manager, he stated that he did see that my name was on a
8 lease with another lady's name, which I have no idea who
9 she is. And then he said that they were going to do an
10 internal investigation to figure out what was going on.

11 Q. Gotcha. So are we still talking about the
12 same time period, which would have been like early to
13 mid November 2021?

14 A. Correct.

15 Q. Okay. Alert comes up. You called in to the
16 office of the apartments. They're kind of giving you
17 the runaround. Property manager not there for like a
18 week or so, right?

19 A. Correct.

20 Q. Okay. And then eventually the property
21 manager does get back to you, and he told you they were
22 just going to do an internal investigation?

23 A. Correct.

24 Q. Okay. When was the next time you heard from
25 them?

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1 A. Actually I had to reach back out to them
2 because they wasn't -- like, as I mentioned, they wasn't
3 corresponding with me, so I gave it about a week. I
4 reached back out to the property. Still no answers.
5 Still trying to get ahold of the property manager.

6 He said, well, they're still doing an
7 investigation. Probably about mid December is when I
8 spoke to him again, and he said that he did reach out to
9 I.Q. Data. Upon his investigation, he reached out to
10 I.Q. Data to go ahead and get the alleged debt removed
11 from my credit report.

12 Q. Okay. And you said that was sometime in mid
13 December that he told you that?

14 A. It could have been mid December or January
15 of 2022.

16 Q. Sometime between mid December, early
17 January -- mid December 2021, January 2022?

18 A. Correct.

19 Q. Okay. And the substance of what he told you
20 was, you know, we messed this up. You're right. We're
21 going to contact I.Q. Data. We'll get this taken off
22 your credit report?

23 A. Yes, sir.

24 Q. Okay. Did you ever receive any letters from
25 I.Q. Data?

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1 A. Yes.

2 Q. Okay. What kind of letter did you receive
3 from I.Q. Data?

4 A. I received an initial -- just a debt
5 collection letter saying that I owed this amount of
6 debt. It had my name and then the other lady's name on
7 it as well.

8 Q. Okay. Do you happen to recall around what
9 time that was?

10 A. That was in December of 2021.

11 Q. Same time? Okay. And you were living at --
12 well, you never lived at the Icon Apartments. You were
13 living at the -- I'm blanking on the name again where
14 you currently are. Castle something?

15 A. The Life at Castle Hills, yes.

16 Q. Life at Castle Hills, okay. And so is that
17 where they sent the letter?

18 A. Yes, sir.

19 Q. Gotcha. And how many letters total did you
20 receive? Is that the only one?

21 A. I received that letter from them. And then
22 when I originally reached out to them, the young man on
23 the phone, the customer service representative, told me
24 that I would have to fill out a fraud form for them, and
25 I received that fraud form from them as well.

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1 Q. Gotcha. So one letter about the debt, and
2 then after you contacted them, they sent you that fraud
3 form?

4 A. Correct.

5 Q. Okay. And I heard you say that you called
6 them. Prior to that, had they ever contacted you by
7 phone at all?

8 A. Yes, they did. They contacted me, but I never
9 had any communication with them because I didn't know --
10 it was a debt collector, but I didn't know who -- you
11 know, who it was.

12 Q. Okay.

13 A. So I --

14 Q. And was it like -- sorry. No. Go ahead.

15 A. I never had any communications with them, but
16 once I noticed -- when I did reach out to them, I
17 noticed that I had a missed call from them with the same
18 number. So that's how I knew they did reach out to me.

19 Q. Gotcha. And so in terms of time line here,
20 did you receive the letter before or after you heard
21 back from the property manager that he was going to call
22 I.Q. Data and tell that, you know, that they needed to
23 take this debt away?

24 A. I received the letter before that.

25 Q. Okay. How about the phone call, before or

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1 after?

2 A. I would say before. Before I actually spoke
3 with the property manager. Before.

4 Q. Okay. Once you had -- you know, had the
5 conversation with the property manager, what made you
6 reach out to I.Q. Data?

7 A. I reached out to I.Q. Data prior to the
8 property manager because I couldn't get ahold of the
9 property manager, and they --

10 Q. Oh, okay. So this was that period where he
11 had not -- he said he was going to do the investigation,
12 but he hadn't gotten back to you yet?

13 A. Correct.

14 Q. Gotcha. And so it's obviously still on your
15 credit report, so you contact I.Q. Data to ask them
16 what's going on?

17 A. Right.

18 Q. Okay. What did they tell you when you
19 contacted them?

20 A. So I spoke with two representatives the first
21 day that I initially called, and the first guy that I
22 spoke with, he told me that -- he's the one that said
23 the fraud form. He told me that I needed to fill out
24 the fraud form for this alleged debt that's on my credit
25 report.

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1 And so I called -- after I hung up with
2 him, I called back, and I spoke to another
3 representative, and he's the one that really kind of
4 told me what was going on with the credit. I knew
5 nothing from Icon that -- from the apartment complex.
6 He's the -- the one from I.Q. Data is the one that
7 explained.

8 He said, it looks like you have an old
9 debt from this apartment complex, and you're on a lease.
10 I think he told me her name was Alexis something. I
11 don't remember her last name. I'm sorry. But he said,
12 you and this young lady have an outstanding debt to this
13 apartment complex. And I said, well, I never lived
14 there.

15 And he said, well -- he said I needed
16 to -- I believe he told me that I needed to reach out to
17 the apartment complex to get the situation handled, but
18 he's the one that gave me the information on the other
19 young lady because I knew nothing about that.

20 Q. Okay. So at that point when you were speaking
21 with I.Q. Data, you didn't even know that there was this
22 other person who was on this lease or anything like
23 that, right?

24 A. No, sir.

25 Q. Okay. And is it fair to say that, you know,

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1 you had already contacted to Icon at that point, so did
2 you tell him, hey, you know, I already reached out to
3 the apartment complex? Here's what they said?

4 A. Correct. And I said, I haven't -- I said, I
5 haven't -- because at that time, I had not heard back
6 from Icon Apartments that -- from Icon Apartments at
7 that time.

8 Q. Okay. What did he tell you when you told him
9 you had -- you know, I already contacted the apartment?

10 A. Honestly, I don't remember what he said at
11 that time. I couldn't remember if he requested -- if he
12 advised the fraud form or not, but I believe the
13 initial -- the first person that I spoke with is the
14 person that requested the fraud form. I can't remember
15 what the second guy told me to do after I reached out to
16 Icon Apartments.

17 Q. Okay. And just for, you know, the jury who
18 doesn't understand, what exactly was the purpose of the
19 fraud form?

20 A. I really don't know why he told me to fill out
21 a fraud form because I think he was trying -- I told him
22 that this wasn't my debt, and he said that, well, you
23 have to fill out a fraud form for us to do an
24 investigation on the alleged debt that's in your name.

25 And so he said that if somebody -- he said

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1 it looked like somebody may have used your social
2 security or applied for something in your name, so you
3 would have to fill out a fraud form.

4 Q. Okay. Did you ever fill out that fraud form?

5 A. No, sir.

6 Q. Gotcha. After you had these calls with the
7 I.Q. Data, and they asked you to fill out the fraud
8 form, and you didn't do that, what was the next thing
9 that happened? Did you hear back from anyone else? Or
10 I know you spoke with the guy at the Icon Apartments.
11 After you spoke with him, what happened next?

12 A. So I kind of was just sitting in limbo at that
13 point. I didn't -- I didn't hear anything back from
14 I.Q. Data. I didn't hear anything back from the Icon
15 Apartments.

16 I think it was maybe March or April
17 of 2022, when the debt finally came off of the credit
18 report, and I still was trying to reach out to Icon
19 Apartments just to get some information on when it was
20 coming off because I was looking to move, and that was
21 hindering me tremendously from moving.

22 So I was just kind of just stuck in limbo
23 because I wasn't hearing anything from either party.

24 Q. Okay. Let's break that down a little bit. So
25 as far as the credit reporting, it was still continuing

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1 to show up on your credit report after you had spoken
2 with I.Q. Data and the property manager at Icon, fair?

3 A. Yes.

4 Q. Okay. Do you happen to know whether it was
5 marked as disputed or undisputed?

6 A. No, sir.

7 Q. Okay. Do you understand the difference
8 between a disputed and an undisputed debt?

9 A. Yes, sir.

10 Q. Okay. Do you have any reason to believe that
11 after you spoke with either Icon or I.Q. Data, that the
12 debt was not marked as disputed?

13 A. No, sir.

14 Q. Okay. So entirely possible that after you
15 spoke with them, they said, hey, you know, this is
16 wrong, reporting it to the credit agency, the correct
17 agency marked it as disputed. That's totally possible,
18 right?

19 A. Yes.

20 Q. Okay. Do you happen to know whether anyone
21 can take any adverse action against you over a disputed
22 debt?

23 A. No, sir.

24 Q. Gotcha. If I was to represent to you that no
25 one can take adverse action against you based on a

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1 disputed debt until that dispute is resolved, would you
2 have any reason to dispute that?

3 A. No, sir.

4 Q. Okay. I believe -- and correct me if I didn't
5 hear you correctly. So as far as time line, you know,
6 this stuff happened mid December, early January. When
7 did you -- without getting into the substance of any
8 conversations, when did you first contact an attorney?

9 A. January of 2022 -- this year, January of 2022.

10 Q. Okay. So that would have been shortly after
11 you had these conversations with I.Q. Data and Icon,
12 fair?

13 A. Yes.

14 Q. Gotcha. But you still had not heard back from
15 them at that point?

16 A. Correct.

17 Q. Gotcha. Did the debt ever come off of your
18 credit report?

19 A. Yes.

20 Q. And when did that happen?

21 A. April of 2022.

22 Q. Okay. So in total, the time period we're
23 talking about here where this debt was appearing on your
24 credit report, that's from November 2021 to April 2022;
25 is that right?

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1 A. Yes.

2 Q. Gotcha. And during that time, I think I heard
3 you correctly say that you were trying to move
4 apartments at that time, right?

5 A. Yes, sir. My lease was currently up at my
6 current complex, and so I was planning on moving
7 November or December of 2021.

8 Q. Gotcha. So how long was -- I think I heard
9 you say that you signed your lease around April of 2021,
10 so does that mean you would have been running out April
11 2022?

12 A. Correct. Well, no, my lease was up -- I
13 signed my lease in 2020. That's when I initially
14 applied at Icon Apartments in 2020. So I was here
15 currently for a whole year. I was already paying my --
16 in April of 2021, I was -- after my lease was up I
17 didn't resign. I was still paying month to month.

18 And then November or December was when I
19 was planning on moving, and we had a new complex come in
20 and take over. So at that time, I was ready to go ahead
21 and transition to a new place any ways.

22 Q. Gotcha. So you were paying month to month.
23 November, December comes in. They bring in new property
24 management people at the place you're currently at, so
25 you were looking for new places?

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1 A. Correct.

2 Q. Okay. How many new places did you look at?

3 A. I would say about ten.

4 Q. Ten different -- and same thing. Just another
5 apartment complex?

6 A. Yes, sir.

7 Q. Gotcha. And did you ever fill out any
8 applications at any of those places?

9 A. Yes.

10 Q. Gotcha. And did any of them ever say anything
11 about, you know, hey, sorry, your credit. There's this
12 issue here, so we can't rent you this apartment,
13 anything like that?

14 A. Yes. I did get denied at two places, and then
15 also, once I noticed that pattern, I kind of started
16 asking, hey, if I apply, I do have a debt that's on my
17 credit showing from -- you know, an alleged debt from
18 another property. Could that deny me in any way? And
19 they did advise me, yes.

20 So I didn't want to waste anymore money
21 paying application fees or paying for admin fees and
22 things like that. So I kind of just stopped applying at
23 that point.

24 Q. Okay. So let's break that down a little bit.
25 So you had some applications get denied, right?

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1 A. Yes.

2 Q. Okay. And no one specifically told you though
3 that the reason that the application was getting denied
4 was because you had this debt. You asked, hey, is it
5 possible that a debt could do this? And they said, yes,
6 that's possible. Is that fair?

7 A. No, sir.

8 Q. Okay.

9 A. So the complexes that I did apply at, I asked
10 what was the reason for the denial, and they did tell me
11 because of the old property that was on my credit
12 report, that I owed a property.

13 So after those two got denied, I started
14 asking other properties before I applied, could this
15 deny me, so I wouldn't spend money with application fees
16 and admin fees, and they're the -- after that -- at that
17 point is when the properties were like, yeah, you could
18 get denied. There's a possibly you could get denied
19 because of an old property because it looks like you
20 broke a lease.

21 Q. Gotcha. So the first two apartment complexes,
22 they said, hey, this old debt that's on here is an
23 issue, fair?

24 A. Correct.

25 Q. The rest of the places, you just asked, hey,

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1 could this be an issue? They said, possibly, and so you
2 just didn't even go through with it, right?

3 A. Yes, sir.

4 Q. Okay. Did you pay application fees for those
5 first two places that you applied to?

6 A. Yes.

7 Q. Do you happen to recall how much the
8 application fee was?

9 A. One was \$75 for the first apartment complex,
10 and there was also a \$25 admin fee, so it was a hundred
11 dollars for that. The second property, I paid \$50 for
12 the application fee, and then it was \$50 admin fee, so
13 that was also a hundred dollars.

14 Q. Okay. And that was nonrefundable?

15 A. Yes, sir.

16 Q. Gotcha. So you were out \$200 for those
17 applications?

18 A. Correct.

19 Q. Awesome. So when -- around what time was that
20 you said -- you know, we've been talking November,
21 December, January. So was this in that November to
22 January window when you were reaching out to these
23 folks?

24 A. Yes.

25 Q. Okay. Did you still have the medical debt

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1 issue at that time?

2 A. Yes, because I didn't pay that off until
3 January of 2020.

4 Q. Okay. So that would also have been on your
5 credit report as well?

6 A. Correct.

7 Q. Gotcha. As far as correspondence with those
8 first two places where you submitted the application, do
9 you have any emails from those folks discussing your
10 application, anything like that?

11 A. I don't have any emails. I did go into the
12 property to fill out the application. I may have -- I
13 may still have one or two emails where we kind of -- I
14 was trying to just check the status of the application
15 still in my inbox.

16 Q. Gotcha. Okay. So you wouldn't have any
17 difficulty accessing those, assuming that, you know, you
18 still had those emails. You haven't purged a bunch of
19 emails or anything like that, right?

20 A. No, sir.

21 Q. Okay. Do you happen to recall the name of
22 those two apartment complexes?

23 A. One is called The Ventera. It's called the
24 Life at Ventera. It's here in San Antonio.

25 Q. And what about the other one?

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1 A. I want to say it's called The Park Place. I
2 can't remember the last name of it. It's called Park
3 Place -- I'm sorry. This was like a year ago.

4 Q. No problem at all. Like I said, it's not a
5 memory test. So Park Place something, right?

6 A. Something like that, yes, sir.

7 Q. And then presumably, if you had email
8 correspondence with them, the name of the apartment
9 complex would probably in there somewhere, right?

10 A. Uh-huh.

11 Q. Gotcha. As far as the current apartment that
12 you're staying at, were you -- did you just continue to
13 do month to month?

14 A. Yes, sir.

15 Q. Okay. When the new folks -- the new ownership
16 group came in, did your rent go up, down, stay the same?

17 A. My rent went up, and their month-to-month
18 contract went up to \$300 a month.

19 Q. What was it previously?

20 A. A hundred dollars a month for not being under
21 a contract.

22 Q. Okay. Was there any particular reason you
23 didn't want to go under contract? You were still
24 looking to move, so you didn't want to get locked in for
25 a year or something?

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1 A. Yes, that was the reason.

2 Q. Okay. But as far as the price going up, that
3 was related to new ownership and the month-to-month
4 rental, right? That wasn't anything related to your
5 credit?

6 A. Correct. Yes, sir.

7 Q. Okay. Great. One thing, I forgot to mention
8 this at the beginning. This is, you know, the new Zoom
9 world we live in. If at any time we get disconnected or
10 anything like that, or you can't hear me or anything,
11 just go ahead and put your hand in the air.

12 That lets me know that, you know,
13 something cut out or the internet is weird or anything
14 like that. So we make sure that we can stop, get you
15 back on, get everything sorted, and then continue with
16 the record, fair?

17 A. Okay. Yes, sir.

18 Q. Great. I'd like to go over a couple of
19 statements in your petition if that's all right. Did
20 you see a copy of your petition before it was filed?

21 A. Yes, sir.

22 Q. Okay. Again, without getting into the
23 substance of any conversations you had with your
24 attorney, how many times did you speak with them after
25 first contacting them before this petition was filed?

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1 MR. DAHER: Objection. I mean, what's
2 the relevance of that question, other than trying to get
3 privileged information?

4 MR. HAMEL: I'm not asking about any of
5 the substance, so it's not privileged, and it goes to
6 one of our potential affirmative defenses, which would
7 be if this was filed in bad faith.

8 MR. DAHER: There's no affirmative
9 defense. Are you talking about bona fide error?

10 MR. HAMEL: No, I'm not talking about
11 bona fide error, and I'm also not asking for the
12 substance, so it's not privileged. I mean, you can
13 instruct her not to answer. I'm asking her how many
14 times she contacted you, not what she talked about.

15 MR. DAHER: You can answer, Ms. Reed.

16 A. We've been in contact several times prior to
17 that.

18 Q. (BY MR. HAMEL) Okay. Have you ever paid them
19 anything for their fees?

20 A. No, sir.

21 Q. Gotcha. And you said several times, so you
22 know, you reached out, you contacted them, had a
23 discussion. Was that the only discussion you had prior
24 to the lawsuit being filed, or did you have multiple
25 discussions?

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1 A. We've had multiple discussions.

2 Q. Did you get a chance to review your petition
3 before it was filed?

4 A. Yes, sir.

5 Q. Gotcha. All right. So a couple of things in
6 the petition I wanted to go through. There were some
7 statements in here that I wanted to make sure I double
8 checked.

9 A. Uh-huh.

10 Q. It says here, "Plaintiff", which would be you,
11 "felt extremely worried that there could be negative
12 consequences if she did not pay the debt, even though
13 she did not owe the subject debt." Does that sound
14 familiar?

15 A. Yes, sir.

16 Q. Okay. You obviously knew you didn't owe this
17 debt, right?

18 A. Correct.

19 Q. Okay. What were you concerned about then as
20 far negative consequences if you didn't pay it, given
21 that you knew that you did not owe this debt?

22 A. So just the negativity of it being on my
23 credit report for one, and two, I was really stressed
24 out about moving. So the fact that I could not move,
25 and that was affecting me in a negative way because I

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1 couldn't currently get out of the situation that I was
2 in. My space had become extremely too small to
3 accommodate me and my child, so I was just really
4 stressed out about that.

5 And then in between that time, I wasn't
6 hearing anything back from I.Q. Data or the Icon
7 Apartments. So it's just showing up on my credit report
8 as you owe this money. So that was extremely stressful.

9 Q. Okay. So in -- to break that down then. So
10 in terms of negative consequences, what you were
11 concerned about was that this showing up on your credit
12 report was going to damage your credit, fair?

13 A. Correct.

14 Q. Okay. The next statement is, "Defendant,"
15 which would be I.Q. Data International's, "misleading
16 conduct has severely disrupted Plaintiff's life and
17 general wellbeing, as Plaintiff constantly feared
18 serious consequences." Does that sound familiar?

19 A. Yes.

20 Q. Okay. What misleading conduct are you
21 referring to in that statement?

22 A. When you say misleading, as far as just
23 representing me in a negative connotation of something
24 that I did not do. So when I initially reached out to
25 them to figure out what's going on, the first

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1 conversation that I had with the first guy, he made me
2 feel like I owed this debt. He made me feel like I had
3 no other choice but to pay this, and the only other
4 option I had was to fill out a fraud form to make --

5 Q. Okay. Sorry. Go ahead.

6 A. That's it.

7 Q. All right. What statements did he make to you
8 that made you feel like you had to pay this debt
9 notwithstanding the fact that you didn't owe it?

10 A. I just felt like he -- when I was explaining
11 it to them, even with the initial reaching out to Icon
12 Apartments, just by getting the runaround, and nobody's
13 like -- nobody was trying to take initiative to figure
14 out what's going on with this made me feel like that
15 was -- I felt defeated because I didn't feel like there
16 was nothing I could do.

17 That's really the reason I reached out to
18 an attorney because I felt defeated. Like there was
19 nothing -- like I couldn't handle the situation, or I
20 couldn't take matters into my own hands at that point is
21 the reason I reached out to an attorney because I felt
22 defeated.

23 Q. Okay. Would it be fair for me to say then
24 that it was not because of any specific statement by
25 I.Q. Data that you felt like you had to pay this debt.

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1 It was that they weren't being helpful. They were
2 basically saying, not my problem, fair?

3 A. Fair, yes.

4 Q. Okay. As far as -- you know, you said this
5 severely disrupted your daily life. How did it severely
6 disrupt your daily life?

7 A. At the time, when I was -- when I initially
8 moved here, I moved into a one-bedroom. My son was not
9 living with me at the time. He was with his dad. And
10 then starting the school year, he moved back home with
11 me. And so I'm in a one-bedroom, and I need more space
12 for me and my -- to accommodate me and my child.

13 So being in this one-bedroom apartment, my
14 son doesn't have his own space. He has to, you know, be
15 in a room with me. He's 10 years old, so he needs his
16 own room. And so that was just -- it was very stressful
17 because I felt like, as a parent, I couldn't make
18 accommodations for my child.

19 And that was the reason that I started to
20 really hunt in November to move because my child was in
21 the home with me.

22 Q. Okay. So the primary issue -- and please let
23 me know if I'm not -- you know, if this isn't right.
24 The primary issue was you felt that this was impacting
25 your ability to get a different apartment with more

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1 space for -- you know, so you and your son could spread
2 out, fair?

3 A. Correct. And then I have also a small
4 business as well that I also run from home, so I just
5 needed more space based upon the business was -- kind of
6 had me more heavy at the time, so I needed more space
7 also to move to accommodate for my business.

8 Q. Okay. What kind of business is it?

9 A. It's baking. I do like parties and birthday
10 parties, weddings. I bake cakes and party favors and
11 things like that.

12 Q. Awesome. So like you just have a catering
13 business?

14 A. Yes, sir.

15 Q. Okay. Did you go to school for that? Like
16 did you go to culinary school or anything, or just
17 you're just really good at baking?

18 A. Sorry.

19 Q. No worries.

20 A. No, I didn't go to school for anything. I
21 just was really good, self-taught. My grandma just
22 taught me everything. Family cooks and bakes, so just
23 kind of self-taught.

24 Q. Yeah. I was going to say, grandmothers are
25 sometimes the best teachers, right? So in terms of the

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1 business, how is that going?

2 A. It's going pretty well. I've kind of slowed
3 down. I kind of just do just -- I guess like private
4 things here and there. I don't do it as much because I
5 still -- I don't have the space to accommodate for
6 larger parties at the time.

7 Q. Okay. Is that the only thing you're doing for
8 work right now, or do you have a second job? Or I mean,
9 I guess that would be the second job. So do you have a
10 primary job, other than the catering stuff?

11 A. Yes.

12 Q. What do you do?

13 A. I work for the State of Texas for Maximus.

14 Q. Maximus, okay. What do you do for them?

15 A. So I'm a customer service representative
16 for --

17 Q. Gotcha.

18 A. Yes.

19 Q. And how long have you been doing that?

20 A. For the last -- I just transitioned jobs, so
21 for the last four months.

22 Q. Okay. So that's a new job as of four months
23 ago?

24 A. Yes.

25 Q. What were you doing prior to that?

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1 A. I was working for Mission Lane.

2 Q. Okay. And how long did you work for them?

3 A. A year and a half.

4 Q. Okay. New job going well? No issues there?

5 A. Yes.

6 Q. I'd like to talk about a couple other things
7 in the petition. So one of the statements made in the
8 petition is, "Defendant demanded payment from
9 Plaintiff."

10 Is that referring to the letter that you
11 were sent, or is that about something else?

12 A. That was referring to the letter that was sent
13 for payment, and then also I believe the guy on the
14 phone also asked for a payment.

15 Q. Which guy? Would that be the first call or
16 second call?

17 A. First call.

18 Q. First call. And was that before or after you
19 told him that, you know, hey, I've never lived there; I
20 don't owe that?

21 A. I believe that was before because when I first
22 got on the phone, he was like, we show that you have a
23 such-and-such outstanding debt. How would you like to
24 pay this.

25 Q. Gotcha. After you told him it was disputed,

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1 did anybody demand payment from you?

2 A. Not that I can recall.

3 Q. Okay. Did you receive anymore letters after
4 that point asking for payment?

5 A. No, sir.

6 Q. Gotcha. Regarding kind of the day-to-day
7 stressful stuff, you ever -- have you seen a doctor
8 about that?

9 A. I was in -- shortly in counseling just for
10 mental issues.

11 Q. Okay.

12 A. Not -- yes, sir.

13 Q. What -- when you say counseling, is that with
14 a psychiatrist, psychologist, just a --

15 A. Psychiatrist.

16 Q. Psychiatrist?

17 A. Yes.

18 Q. How long have you been seeing a psychiatrist?

19 A. I was seeing them for three months.

20 Q. Okay. And when did that start?

21 A. That started June of 2022 up until about
22 October -- about August of this current year, 2022.

23 Q. So June 2022 to August 2022; is that right?

24 A. Uh-huh, yes, sir.

25 Q. Okay. And that would have been after the

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1 credit -- the debt was removed from the credit report,
2 fair?

3 A. Correct.

4 Q. Okay. What -- are you asserting that
5 basically you needed to go see the psychiatrist because
6 this debt was reported on your credit?

7 A. Along with mental -- other mental issues, yes.

8 Q. Okay. I mean, obviously a very stressful time
9 for a lot of folks, so I totally understand that. So it
10 wasn't the only reason you were going to do that, but
11 you're saying it was a reason?

12 A. Sure.

13 Q. Okay. Do you happen to know the name of the
14 psychiatrist?

15 A. Well, it was with my EAP which is for my
16 company, so they just recommend a different psychiatrist
17 every time. I can give you the names of them, but it
18 was just -- it was just sessions that I was getting that
19 I was -- like 30-minute-increment sessions that I was
20 getting from -- with my company, my employer.

21 Q. Gotcha. Would that have been the State of
22 Texas one or the prior Mission Lanes?

23 A. Well, Mission Lanes. That was with Mission
24 Lanes, yeah.

25 Q. Okay. Was it just Telehealth?

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1 A. Yes.

2 Q. And you said 30-minute sessions, different
3 person every time, fair?

4 A. Uh-huh. You would just call in. It was very
5 private sessions. Like you would just call in and get,
6 you know, counseling for whatever you're going through
7 at that time.

8 Q. Have you ever done any counseling like that at
9 any time in the past?

10 A. No.

11 Q. And I think you said, you know, a different
12 person every time. If you needed to, you could probably
13 get a list of them, but you don't remember off the top
14 of your head, fair?

15 A. Uh-huh.

16 Q. Gotcha. And no longer doing that though,
17 right? Those ended in August of 2022?

18 A. Yes.

19 Q. Okay. Did you ever take any medication or
20 anything like that?

21 A. No, sir.

22 Q. As far as out-of-pocket damages that you're
23 alleging related to this credit-reporting issue, did you
24 have any payments you had to make other than the
25 application fees?

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1 A. Just for the extra month-to-month fees that I
2 was paying for -- to the new property.

3 Q. Okay. And to be fair, I think you did say
4 that the month-to-month stuff was a new ownership group
5 came in and increased the rent, right?

6 A. Correct. Well, they increased the rent. The
7 rent was increased, but in addition to the rent being
8 increased, it was an additional \$300 per month, which
9 I'm still currently paying.

10 Q. Okay. So if you had been able to find a new
11 apartment, maybe you could have found a better rate than
12 having to just kind of eat the rent increase that was
13 put in by the new ownership?

14 A. Yes, sir, absolutely.

15 Q. Gotcha. In terms of your interactions with
16 I.Q. Data International, are you alleging that anyone at
17 I.Q. Data knew that this debt should not have been
18 reported on your credit and was just still trying to
19 collect the debt from you any way?

20 A. I'm not sure. To be honest, I'm not sure.

21 Q. Well, let me break it down this way, right?
22 So you call them up. He says, hey, you owe this; you
23 need to pay it, right?

24 A. Yes.

25 Q. Okay. And you say, I don't owe this. I've

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1 never lived at the Icon Apartments. I have no clue what
2 this is. I'm disputing this, right?

3 A. Uh-huh.

4 Q. Okay. And he says, okay, fine. You can fill
5 out this fraud form?

6 A. Correct.

7 Q. Okay. Anything about that, did that lead you
8 to believe that he knew that you did not owe this, and
9 yet in spite of his knowledge of that fact, he was still
10 trying to collect the debt from you?

11 A. The first guy made me feel that way, yes.

12 Q. Okay. What about how he acted led you to
13 believe that he knew that you didn't owe this debt, and
14 he was still trying to collect it from you?

15 A. I think it was just -- it was the
16 persistentness (sic), and I'm not -- I can't say that he
17 a hundred percent knew. I think he was just doing his
18 job at the end of the day. That's just what he's paid
19 to do.

20 So I think it was just the persistency of
21 it, and it made me feel very uncomfortable, which is the
22 reason I called -- after I hung up with him, I called
23 and spoke to someone else, because I --

24 Q. Okay. The second person you spoke to, did
25 they make you feel like they knew that this debt was

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1 owed and they -- that this debt was not owed, and they
2 just didn't care?

3 A. No. That's the guy that -- the second guy I
4 spoke to was the one that initially told me about that
5 someone else was on the lease. He initially told me
6 about the other person that was on the lease. So no, he
7 didn't make me feel that way at all.

8 Q. And again, that first person, the issue you
9 had with him was his persistence, I think you said. So
10 it's basically he kept insisting either you pay this, or
11 you fill out the fraud form?

12 A. Correct. It was either you do this or do
13 that, yes.

14 Q. Either pay it or fill out the fraud form?

15 A. Correct.

16 Q. Gotcha. At any time -- this may feel like an
17 obvious question, so I'm sorry. I kind of got to go
18 through it. I mean, you obviously knew this whole time,
19 this entire process that you didn't owe this debt,
20 right?

21 A. Correct.

22 Q. Okay. Do you recall ever receiving a copy of
23 interrogatories that we sent to you?

24 A. No, sir.

25 Q. Okay. Do you know what an interrogatory is?

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1 A. No, sir.

2 Q. It's a big-ole legal work, so I'm not going to
3 blame you for that. We lawyers, we like our big words.
4 Basically, they were just questions that we sent to you
5 that we wanted you to answer. Does that sound familiar?

6 A. Yes, sir.

7 Q. Did you answer those questions?

8 A. Yes, sir.

9 Q. Okay. So one of those ones I'd like to ask
10 you about. We stated, "if you contend that you have
11 suffered mental anguish or emotional distress for which
12 you're entitled to recover damages in this lawsuit and
13 for which you have seen a healthcare provider or
14 therapist, state the name of such healthcare provider,
15 if any, the date on which you began seeing them, and the
16 amounts, if any, which you have been charged for such
17 services."

18 Your response to that was "at this time
19 Plaintiff has not seen a healthcare provider due to the
20 anguish and distress caused by Defendant." That's
21 obviously not right, is it?

22 A. Yes, sir, but I think at the time that was
23 filled out I had not seen the psychiatrist or anything
24 at the time when that was filled out.

25 Q. Okay. So at the time that this was filled

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1 out, you hadn't done that, but now you have?

2 A. Yes.

3 Q. Gotcha.

4 A. That's correct.

5 Q. Gotcha. Ms. Reed, I think I am almost done,
6 so why don't we do this. Would it be all right -- well,
7 and your attorney may have some questions for you as
8 well. Would it be all right if we could take a quick
9 five-minute break so I can go over my notes? We'll come
10 back, and then I'll probably be done?

11 A. Sure.

12 MR. DAHER: Yep. No worries.

13 (Break taken from 10:50 a.m. to 11 a.m.)

14 Q. (BY MR. HAMEL) Ms. Reed, I only have like two
15 or three more questions for you and then, unless your
16 attorney has any followups, that will probably be it.

17 So one thing we discussed, this debt came
18 off your credit report April 2022. We've talked about
19 that, right?

20 A. Uh-huh.

21 Q. Okay. You are still at The Life at Castle
22 Hills apartment, right?

23 A. Correct.

24 Q. Okay. Same apartment that you've been renting
25 this whole time, new apartment?

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1 A. It was -- it's the same apartment, yes. It's
2 just under new management, so it is under a new name
3 now.

4 Q. Got you. Any particular reason why you were
5 not able to move into a new apartment after the debt was
6 removed from your credit report?

7 A. Just because I was still playing catchup.
8 Honestly, when they hit me with the \$300, I got
9 extremely behind in bills. That's just the honest
10 truth. So I didn't want to leave here until I like kind
11 of just caught up with all my bills and making sure I'm
12 able to pay what was owed here.

13 Q. Okay. So I think if I understood you
14 correctly, what you're saying is, the issue is when they
15 increased your rent, you maybe got a little bit behind
16 in some of those payments, so you don't want to try and
17 switch because then these folks are going to be coming
18 after you, fair?

19 A. Correct. And it was -- also the increase in
20 rent, and then as I mentioned, the month-to-month fees
21 were starting to add up.

22 Q. Okay. Have you gotten caught back up on those
23 or still trying to catch up?

24 A. No. Almost to where I need to be, but yes,
25 sir.

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1 Q. So not quite yet?

2 A. Not quite yet, yes.

3 Q. Gotcha. That's all I have for you right now.

4 MR. HAMEL: So I will pass the witness.

5 MR. DAHER: No further questions. Thank
6 you.

7 THE REPORTER: Do you want her to read
8 and sign?

9 MR. DAHER: We'll waive.

10 THE REPORTER: Would the attorneys please
11 state on the record how they would like their copies?

12 MR. HAMEL: E-transcript please.

13 MR. DAHER: Same here.

14 (Deposition concluded at 11:03 a.m.)
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DENYONNA N. REED,) CIVIL ACTION
)
PLAINTIFF,)
)
VS.)
) COMPLAINT 5:22-CV-00068
I.Q. DATA INTERNATIONAL,)
INC.,)
)
DEFENDANT.)

REPORTER'S CERTIFICATION

DEPOSITION OF DENYONNA N. REED

DENYONNA N. REED

I, Michelle Hill, Certified Shorthand Reporter in
and for the State of Texas, hereby certify to the
following:

That the witness, DENYONNA N. REED, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the amount of time used by each party at the
deposition is as follows:

MR. MARWAN DAHER.....00 HOUR(S):00 MINUTE(S)

MR. BENJAMIN E. HAMEL.....00 HOUR(S):50 MINUTE(S)

DENYONNA N. REED - October 21, 2022

1 That pursuant to information given to the
2 deposition officer at the time said testimony was taken,
3 the following includes counsel for all parties of
4 record:

5 FOR THE PLAINTIFF: MR. MARWAN DAHER

6 FOR THE DEFENDANT, I.Q. DATA INTERNATIONAL, INC.:

7 MR. BENJAMIN E. HAMEL AND MR. DYLAN BASS

8 That \$_____ is the deposition officer's
9 charges to the Defendant for preparing the original
10 deposition transcript and any copies of exhibits;

11 I further certify that I am neither counsel for,
12 related to, nor employed by any of the parties or
13 attorneys in the action in which this proceeding was
14 taken, and further that I am not financially or
15 otherwise interested in the outcome of the action.

16 Certified to by me this 2nd day of November, 2022.

17
18
19 _____
20 Michelle Hill
21 Texas CSR No. 5663
22 Expiration Date: 07/31/2024
23 Court Reporters Clearinghouse
24 1225 North Loop West, Suite 327
25 Houston, Texas 77008
713-626-2629